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*Counsel for Plaintiff Yosuke Hiradate, on
behalf himself and all others similarly situated.*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

YOSUKE HIRADATE, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

RALPHS GROCERY COMPANY, an
Ohio Corporation; THE KROGER
COMPANY, an Ohio Corporation; and
DOES 1-50, inclusive,

Defendants.

Case No. 2:22-cv-03593-SSS-PD

DISCOVERY MATTER

**NOTICE OF MOTION TO
COMPEL FURTHER RESPONSES
TO DISCOVERY REQUESTS
FROM DEFENDANT THE
KROGER COMPANY**

Judge: Hon. Patricia Donahue

Courtroom: 580

Date: May 1, 2023

Time: 1:30 p.m.

Discovery Cut-Off: February 16, 2024

Pretrial Conference: July 19, 2024

Trial Date: August 5, 2024

**TO THE HONORABLE COURT AND TO DEFENDANTS AND THEIR
ATTORNEYS OF RECORD:**

NOTICE IS HEREBY GIVEN that on May 1, 2023 at 1:30 p.m., or as otherwise scheduled by this Court, before the Honorable Patricia Donahue, in Courtroom 580 of the Roybal Federal Building and United States Courthouse for the Central District of California, Central Division, 255 E. Temple St., Los Angeles, CA 90012, Plaintiff will move to compel further responses from Defendant The Kroger Company to his Interrogatories, Set One, and Requests for Production of Documents, Set One, pursuant to Federal Rules of Civil Procedure, Rule 37.

In accordance with Local Rule 37-1, Plaintiff met and conferred with Defendant several times in good faith to settle their issues with respect to discovery, but were unable to resolve the issues in contention. In accordance with Local Rule 37-2, Plaintiff hereby submits the attached Joint Stipulation, which describes every outstanding discovery issue in dispute, each party's contentions and points and authorities with respect to all outstanding issues in dispute, and how each party proposed to resolve the issues in dispute. The Joint Stipulation also contains a brief introductory statement from each party.

DATED: April 4, 2023

**SCHONBRUN SEPLOW HARRIS
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By: /s/ Joshua A. Fields

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JOSHUA A. FIELDS
AYA DARDARI

*Counsel for Plaintiff Yosuke Hiradate, on
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